

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN**

KENNETH WILLIAMS, on behalf of
himself and all others similarly situated,

Plaintiffs,

v.

CONTINENTAL
AKTIENGESELLSCHAFT;
CONTINENTAL TIRE THE
AMERICAS, LLC; COMPAGNIE
GENERALE DES ETABLISSEMENTS
MICHELIN SCA; COMPAGNIE
FINANCIERE MICHELIN SA;
MICHELIN NORTH AMERICA, INC.;
NOKIAN TYRES PLC; NOKIAN
TYRES INC.; NOKIAN TYRES U.S.
OPERATIONS LLC; THE GOODYEAR
TIRE & RUBBER COMPANY;
PIRELLI & C. S.P.A.; PIRELLI TIRE
LLC; BRIDGESTONE
CORPORATION; BRIDGESTONE
AMERICAS, INC.; AND DOE
COMPANIES 1-100,

Defendants.

No.

CLASS ACTION COMPLAINT
INDEX OF EXHIBITS

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Exhibit	Description
1	2022 Universal Registration Document (April 11, 2023)
2	<i>Smithers forecasts the global tire market to reach \$280 billion in 2024</i> (Dec. 22, 2023)
3	Joy Kopcha, <i>Do Tire Tiers Exist, and Are They Competitive?</i> Modern Tire Dealer (Nov. 7, 2023)

4	<i>EU Tire Cartel Probe Targets Michelin, Continental, Matthew Perlman, Law 360 (Jan. 30, 2024)</i>
5	<i>Commission carries out unannounced antitrust inspections in the tyres sector, European Commission (Jan. 30, 2024)</i>
6	2022 Continental Annual Report, pg. 26
7	2022 Universal Registration Document, pg. 16 (April 11, 2023)
8	Bridgestone Home Page
9	ProPublica, <i>Overinflated: The Journey of Humble Tire Reveals Why Prices Are Still So High</i> (May 3, 2023)
10	Motor Tire Dealer, <i>Michelin Will Raise Consumer, Commercial Prices on Feb. 1</i> (Dec. 19, 2020)
11	Financial Statement Release 2020, Transcript, Nokian (Feb. 9, 2021)
12	Motor Tire Dealer, <i>Continental Plans Price Hike on PLT Tires</i> (Jan. 6, 2021)
13	Motor Tire Dealer, <i>Michelin Will Raise Consumer Tire Prices on April 1</i> (March 1, 2021)
14	Motor Tire Dealer, <i>Goodyear to Increase Consumer Tire Prices</i> (March 3, 2021)
15	Motor Tire Dealer, <i>Pirelli Will Raise Prices in U.S. on April 15</i> (March 9, 2021)
16	Motor Tire Dealer, <i>Bridgestone to Raise Consumer Tire Prices on May 1</i> (March 24, 2021)
17	Motor Tire Dealer, <i>Goodyear Plans Another Consumer Tire Price Hike</i> (May 3, 2021)
18	Motor Tire Dealer, <i>Continental Will Raise Consumer Prices in July</i> (May 5, 2021)
19	Motor Tire Dealer, <i>Pirelli Plans Another Price Hike</i> (May 18, 2021)
20	Typress, <i>Michelin announces North America price increases</i> (Aug. 3, 2021)
21	Ratchet and Wrench, <i>Goodyear and Cooper Consumer Tire Prices Are Going Up</i> (Aug. 10, 2021)
22	Tire Review, <i>Continental Tire Announces Price Increase</i> (Aug. 30, 2021)
23	Rubber News, <i>Pirelli raising prices for fourth time in 2021</i> (Aug. 31, 2021)
24	Madeline Winer, <i>Continental Tire Announces Price Increases</i> , Tire Review (Nov. 9, 2021)
25	PR Newswire, <i>Michelin Implements Price Increase Across Passenger Brand and Commercial Offers in North American Market</i>

	(Dec 1, 2021)
26	Daneille Hess, <i>Pirelli Announces Price Increases for Car, Light Truck Tires</i> , Tire Review (Jan. 3, 2022)
27	Christian Hinton, <i>Continental Tire Announces Price Increase</i> , Tire Review (Mar. 1, 2022)
28	Michelin Press Release, <i>Michelin Implements Price Increase Across Passenger Brands and Commercial Offers in North American Market</i> (Mar. 1, 2022)
29	Christian Hinton, <i>Bridgestone Price Increase for Consumer Replacement Tires</i> , Tire Review) (Mar. 2, 2022)
30	Christian Hinton, <i>Pirelli Increases Price for Car and Light Truck Tires</i> , Tire Review) (Mar. 23, 2022)
31	Tire Business, <i>Conti to raise U.S. Tire prices again</i>) (Apr. 19, 2022)
32	Michelin, Press Release (May 2, 2022)
33	Brian Coote, <i>Pirelli to Increase Prices on U.S. PLT Tires</i> , Tire Review) (May 17, 2022)
34	Tire Business, <i>Goodyear to raise North America Tire prices July 1</i>) (June 15, 2022)
35	Brian Coote, <i>Bridgestone to Increase Consumer Tire Prices in U.S., Canada</i> , Tire Review) (June 6, 2022)
36	Christian Hinton, <i>Bridgestone Announces Price Increases up to 15% on Select Tires</i> , Tire Review) (Sept. 8, 2022)
37	Samuel Grom, <i>Michelin Introduces Prices Increases in Canada, U.S.</i> , Tire Review) (Dec. 13, 2022)
38	Samuel Grom, <i>Bridgestone Americas Increases Replacement Tire Prices</i> , Tire Review) (Dec. 13, 2022)
39	Goodyear, Q1 2022 Interim Results Earnings Call Transcripts) (May 6, 2022)
40	Continental, 2022 Annual Report, pg. 73
41	Goodyear, Q1 2022 Interim Results Earnings Call Transcripts) (May 6, 2022)
42	The Goodyear Tire & Rubber Company, 2022 Annual Report, pg. 7
43	Michael Perlman, <i>EU Tire Cartel Probe Targets Michelin, Continental</i> , Law 360) (Jan. 30, 2024)
44	Department of Justice, <i>Bridgestone Corp. Agrees to Plead Guilty to Price Fixing on Automobile Parts Installed in U.S. Cars</i>) (Feb. 13, 2014)
45	Michael, Grabell, <i>Overinflated: The Journey of a Huble Tire Reveals Why Prices Are Still So High</i> , Pro Publica) (May 3, 2023)

46	Goodyear, Annual Report 2022
47	Goodyear, <i>How Are Tires Made?</i>
48	Mathilde Carlier, <i>Number of vehicles in operation in the United States between 1st quarter 2018 and 1st quarter 2023</i> , Statista (Dec. 19, 2023)
49	Bridgestone Americas, <i>Determining Tire Size</i>
50	Traqline, <i>The ‘Goliaths’ of the Replacement Tire Industry Are Getting Bigger. How Can The ‘Davids’ Compete?</i> (Feb. 14, 2022)
51	IBIS World, <i>Tire Manufacturing in the US</i>
52	U.S. Tire Manufacturers Association, <i>About Us</i>
53	U.S. Tire Manufacturers Association, <i>Leadership</i>
54	Nokian, <i>Nokian Tyres’ North American Factory</i>
55	Tire Business, <i>Rising tire prices affected by several factors</i>) (July 8, 2022)